



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAY 02 2006

Don Chutas, Plant Manager
Cargill Salt
916 South Riverside Avenue
Saint Clair, MI 48079

REPLY TO THE ATTENTION OF:

DE-9J

Re: RCRA Compliance Inspection
Cargill Salt
EPA ID No. MID 005 317 185


Dear Mr. Chutas:

On March 28, 2006, Cargill Salt was inspected by United States Environmental Protection Agency (U.S. EPA) representative Mr. Duncan Campbell as a component of U.S. EPA's multi-media inspection. Mr. Campbell evaluated Cargill Salt's compliance with requirements of the Resource Conservation and Recovery Act (RCRA) and the Michigan Administrative Code (MAC) as they applied to your installation's operations. Please find enclosed a copy of the narrative inspection report and Michigan Conditionally Exempt Small Quantity Checklist for your reference.

Based on the information provided by your staff, review of the records and the physical observations made by Mr. Campbell on March 28, 2006, we have determined that Cargill Salt generates hazardous waste from routine performance of quality assurance activities conducted within its laboratory, located at the south end of the property. At the time of the inspection Cargill Salt was subject to the Conditionally Exempt Small Quantity Generator requirements as codified in MAC Part 111 Rule 299.9205.

U.S. EPA detected no violations during its inspection. In the future, your installation may continue to be inspected by either U.S. EPA or Michigan Department of Environmental Quality to determine compliance with relevant portions of RCRA and Michigan's Part 111 Rule 299.9301 et seq. If you have any questions regarding this letter, please contact Duncan Campbell of my staff at (312) 886-4555.

Sincerely,


Paul Little, Chief
Compliance Section 2

cc: John Craig, MDEQ, Waste & Hazardous Materials Division, Lansing
Larry Aubuchon, MDEQ, Southeast District Office

Enclosure

1940 1-17

**U.S. EPA REGION 5
WASTE, PESTICIDES AND TOXICS DIVISION
ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH**

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: Cargill Salt

FACILITY U.S. EPA ID NO.: MID 005 317 185

FACILITY TYPE: Brine operation

FACILITY ADDRESS: 916 South Riverside Avenue
St. Clair, Michigan 48079

FACILITY REPRESENTATIVE: Don Chutas,
Plant Manager

Tony Hodny
EHS Coordinator

U.S. EPA REPRESENTATIVE: Duncan Campbell
U.S. EPA
WPTD, ECAB, Compliance Section 2
77 West Jackson Blvd (DE-9J)
Chicago, Illinois 60604
(312) 886-4555
(312) 353-4342 Facsimile
campbell.duncan@epa.gov

DATE(S) OF INSPECTION: March 28, 2006

NAICS CODE(s): 325998 – Miscellaneous chemical product and preparation
311942 – Spice and extract manufacturing

Prepared by


Duncan Campbell

Date

04/13/2006

Accepted by


Paul Little

Date

4-14-06

INSPECTION: On March 28, 2006, U.S. EPA inspector Duncan Campbell arrived at Cargill's St. Clair operation to participate in a U.S. EPA led multi-media inspection. Mr. Campbell was introduced to five Cargill employees, representing the Saint Clair facility and corporate headquarters in Minneapolis, Minnesota. Mr. Chutas is the Plant Manager for the Saint Clair operations.

PROCESS: Cargill representatives explained in detail the St. Clair operations along with an industry overview of salt manufacturing. In 1886, wells were drilled into the Marvin and Mead Brine fields. Water from the Saint Clair River is pumped down into deep rock salt deposits – part of an extensive salt bed that surrounds the Great Lakes. Cargill purchased this operation from Akzo Nobel in 1997. No mining of salt is conducted at this site. Cargill does mine salt in Ohio underneath Lake Erie and also in New York and Louisiana.

At Saint Clair, brine is pumped up to the surface and processed into a specialty product using an Alberger technique. Alberger is a food grade salt that sells for a premium over common salt that is typically made from evaporation. The Alberger crystal is unique shaped and provides numerous locations for spice [seasoning] to adhere. This is desirable to manufactures of snack foods, such as Frito-Lay. When food manufactures make chips they spray the chips surface with oil. The oil provides tackiness for the Alberger salt to adhere to. The Alberger shape provides numerous locations for a spice or seasoning particle to adhere to increasing the flavor and reducing the incidence of salt and seasoning separating

Cargill also manufactures and warehouses bagged salt for deicing and water softening at Saint Clair. No hazardous waste is generated as a direct result of manufacturing Alberger or deicing salt. Cargill does generate small quantities of laboratory waste as a result of performing quality assurance and quality control of its products and has historically operated as a Conditionally Exempt Small Quantity Generator. Cargill also generates small quantities of "Used Oil" as a result of performing maintenance on gear boxes located throughout the manufacturing area.

WALK-THROUGH

- 1) the last shipment of hazardous waste was comprised of lab pack that Safety-Kleen packed and transported to its Dalton, Illinois TSD [ILD 980 613 913];
- 2) all hazardous wastes were stored in a fire-proof cabinet that was located adjacent to the wet laboratory;
- 3) less than 10 gallons of hazardous wastes were observed in the fire-proof cabinet;
- 4) Cargill manages its "Used Oil" in 55 gallon containers within the shop. At the time of the inspection, Cargill was filling a 55 gallon container. The container was labeled as "Used Oil" and maintained in the closed position.

Record Review

The U.S. EPA inspector reviewed manifests for both the September 27, 2005 and the January 13, 2006, shipments. Signed copies had been returned from the TSD in a timely manner.

Attachments

MDEQ Conditionally Exempt Small Quantity Generator Inspection Checklist

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR INSPECTION FORM

Facility's Name CORRYLL S&F
 Date 03/28/2006 ID# MD 009 317 185

Part 2 Rules
 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Potassium Chromate	lab STUDY	less than
Methanol	11	20 gals
Silicon chloride	11	Every 6 month

NI - Not Inspected N/A - Not Applicable

(rev. 01/16/96 - EAB)

YES NO NI N/A

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

1. Generator comply with the waste evaluation requirements of R 299.9302? (Rule 205(4)(a): 40 CFR 261.5(g)(1))	GGR	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NI <input type="checkbox"/> N/A
2. If the generator accumulated over 1000 kg of hazardous waste or 1 kg of acute or severely toxic hazardous waste did the facility comply with the special provisions of part 3 applicable to generators of between 100 kg to 1000 kg of hazardous waste in a calendar month for the waste that exceeded the limits? (Rule 205(2): 40 CFR 261.5(g)(2))	GRT	<input type="checkbox"/> YES <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
3. For hazardous waste that did not exceed the limits in question #2, did the generator either treat or dispose of the hazardous waste in an on-site facility or ensure delivery to an off-site treatment, storage or disposal facility which: (Rule 205(4)(b): 40 CFR 261.5(g)(3))		
a) Permitted under R 299.9502(3),(4), or (5). (Rule 205(4)(b)(i))	GSC	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
b) A facility which stores or treats the waste & is permitted or licensed. (Rule 205(4)(b)(ii))	GSC	<input type="checkbox"/> YES <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
c) A facility which disposes of the waste & is in compliance. (Rule 205(4)(b)(iii))	GSC	<input type="checkbox"/> YES <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
d) Facility which beneficially uses or reuses, or legitimately recycles or reclaims the waste or treats the waste before beneficial use or reuse, reclamation or recycling. (Rule 205(4)(b)(iv))	GSC	<input type="checkbox"/> YES <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
e) An off-site POTW which is in compliance with Federal, State and Local requirements. (Rule 205(4)(b)(v))	GSC	<input type="checkbox"/> YES <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
f) In another state & is permitted under 40 CFR part 270. (Rule 205(4)(b)(vi))	GSC	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
g) In another state & is in interim status under of 40 CFR parts 270 and 265. (Rule 205(4)(b)(vii))	GSC	<input type="checkbox"/> YES <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
h) In another state & is authorized to manage hazardous waste by that state. (Rule 205(4)(b)(viii))	GSC	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
i) In another state & licensed/registered to manage municipal/industrial solid waste. (Rule 205(4)(b)(ix))	GSC	<input type="checkbox"/> YES <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
4. Hazardous waste accumulated where waste is protected from weather/fire/physical damage/vandals? (Rule 205(4)(c))	GRT	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
5. Accumulated so hazardous waste or hazardous waste constituents cannot escape by gravity into the soil, directly or indirectly, into surface/groundwaters, or into drains/sewers & fugitive emissions are not in violation? (Rule 205(4)(d))	GRT	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
6. If the hazardous waste went to a facility other than the ones specified above, who stored/accumulated the waste, list the name, address, phone of the off-site facility.		

Comments: Safety-Kleen comes to site - packs waste in appropriate lab pack containers and takes waste with it when they ship.



USED OIL INSPECTION FORM – GENERATORS

Facility's Name

Carrill S&T

Part 8 Rules

Date

03/28/2006

ID#

MID 005 317 185

1994 PA 451

Note: Used oil is defined as "any oil which has been refined from crude oil, or any synthetic oil which has been used and as a result of use, is contaminated with physical or chemical impurities." R 299.9109

APPLICABILITY (Rule 809)

NI – Not Inspected, N/A – Not Applicable

YES NO

1. Does the facility generate used oil and any of the following materials which are subject to regulation as used oil:		
a) mixture of used oil and hazardous waste generated by a CESQG regulated pursuant to Rule 205? (Rule 809(1)(a))	UOA	X
b) material that contains or is otherwise contaminated w/ used oil & is burned for energy recovery? (Rule 809(1)(b))	UOA	X
c) used oil that is drained/removed from materials that contain or contaminated w/ used oil? (Rule 809(1)(c))	UOA	X
d) mixture of used oil and fuel? (Rule 809(1)(d))	UOA	X
e) material which is produced from used oil & is burned for energy recovery? (Rule 809(1)(e))	UOA	X
f) used oil that is burned for energy recovery & any fuel produced from used oil by processing, blending or other treatment & exceeds the following: (Rule 809(1)(f))		
i) maximum arsenic concentration of 5ppm	UOA	X
ii) maximum cadmium concentration of 2ppm	UOA	X
iii) maximum chromium concentration of 10ppm	UOA	X
iv) maximum lead concentration of 100ppm	UOA	X
v) minimum flash point of 100 degrees Fahrenheit	UOA	X
vi) maximum total halogen concentration of 4,000ppm	UOA	X
g) recycled and a hazardous waste solely because it exhibits a hazardous characteristic? (Rule 809(1)(g))	UOA	X
h) used oil contains PCB's at any concentration of 50ppm or less? (May also be subject to 40 CFR Part 761) (Rule 809(2)(l))	UOA	X
2. Does the facility generate any of the following which exempts it from regulation as used oil: (may be subject to regulation as a hazardous waste)		
a) mixture of used oil and hazardous waste except as specified in Rule 809(1)(a)? (See question 1.a.) (Rule 809(2)(a))	UOA	X
b) used oil including metalworking oils/fluids containing chlorinated paraffin w/ > 1000 ppm total halogens which hasn't been successfully rebutted by demonstrating that it does not contain significant concentrations of halogenated hazardous constituents in 40 CFR Part 261, Appendix VIII? (Rule 809(2)(b))	UOA	X
c) metalworking oils/fluids w/ chlorinated paraffin reclaimed through a tolling agreement? (Rule 809(2)(b)(i))	UOA	X
d) used oil w/ chlorofluorocarbons from refrigeration units going for reclaim? (Rule 809(2)(b)(ii))	UOA	X
e) material that contains or is otherwise contaminated w/ used oil from which the oil has been removed? (Rule 809(2)(c))	UOA	X
f) mixture of used oil/diesel fuel that is mixed on used oil generator's site & used in their own vehicles? (Rule 809(2)(d))	UOA	X
g) used oil & material derived from used oil that are disposed of or used in a manner constituting disposal? (Rule 809(2)(e))	UOA	X
h) used oil re-refining distillation bottoms used as feed stock to manufacture asphalt products? (Rule 809(2)(f))	UOA	X
i) wastewater, the discharge of which is subject to §402 or §307(b) of the CWA & is contained w/ de minimis quantities of used oil? (Rule 809(2)(g))	UOA	X
j) mixture of used oil/crude or natural gas liquid for insertion into a crude oil pipeline? (Rule 809(2)(h))	UOA	X
k) mixture of oil/crude or nature gas liquid w/ less than 1% used oil if being stored/transported to crude oil pipeline or petroleum refinery for insertion into process before crude distillation or catalytic cracking? (Rule 809(2)(i))	UOA	X
l) used oil for insertion into petroleum refining process before crude distillation or catalytic cracking w/out prior mixing if used oil constitutes less than 1% of crude oil feed? (Rule 809(2)(j))	UOA	X
m) used oil, unintentionally introduced, is captured by a hydrocarbon recovery system or wastewater treatment system at a petroleum refinery & inserted into the refining process? (Rule 809(2)(l))	UOA	X
n) tank bottoms from stock tanks w/mixture of used/crude oil or nature gas liquids? (Rule 809(2)(m))	UOA	X
o) used oil produced on vessels from normal shipboard operations while on-ship? (Rule 809(2)(n))	UOA	X
p) specification used oil fuel once the facility demonstrates compliance w/ R 299.9815(3)(b),(c)&(f)? (Rule 809(2)(o))	UOA	X
q) used oil containing polychlorinated biphenyls at 50 ppm or greater? (Rule 809(2)(p))	UOA	X

GENERATOR REQUIREMENTS (Rule 810)

NOTE: Used oil generator requirements do not apply to: (1) farmers who generate, in a calendar year, an average of 25 gallons per month or less from vehicles or machinery used on the farm, or (2) household do-it-yourselfer

		YES	NO	
3. Is the used oil stored in units other than containers or tanks? (Rule 810(4))	UOA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NI N/A
a) in good condition? (40 CFR 279.22(b)(1))	UOA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NI N/A
b) not leaking (no visible leaks)? (40 CFR 279.22(b)(2))	UOA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NI N/A
4. Are all containers & above ground tanks storing used oil labeled/marked "Used Oil"? (40 CFR 279.22(c)(1))	UOA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NI N/A
5. Are fill pipes used to transfer used oil into underground tanks labeled/marked "Used Oil"? (40 CFR 279.22(c)(2))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
6. Upon detection of a release does the facility:				
a) stop the release? (40 CFR 279.22(d)(1))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
b) contain the released used oil? (40 CFR 279.22(d)(2))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
c) clean-up and manage the released used oil & other material? (40 CFR 279.22(d)(3))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
d) if necessary to prevent future release, repair/replace any leaking oil containers or tanks? (40 CFR 279.22(d)(4))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A

GENERATOR REQUIREMENTS FOR ON-SITE BURNING IN SPACE HEATER (Rule 810 refers to 40 CFR 279.23)

7. Does facility that burns used oil in oil-fired space heater(s):				
a) burn only used oil generated by the owner/operator or from household do-it-yourselfers? (40 CFR 279.23(a))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
b) burn in heaters designed to have a maximum capacity of not more than 0.5 million BTU per hour? (40 CFR 279.23(b))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
c) have combustion gases vented to the ambient air? (40 CFR 279.23(c))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A

GENERATOR REQUIREMENTS FOR OFF-SITE SHIPMENTS OF USED OIL (Rule 810 refers to 40 CFR 279.24)

8. Does the facility use a transporter with an EPA identification number? (Rule 810 refers to 40 CFR 279.24)	UOA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NI N/A
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OR

9. If the facility does not use a transporter w/ an EPA identification number, does it meet one of the following exemptions?				
a) self transportation of small amounts to approved collection centers provided that the generator transports:				
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(a)(1))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(a)(2))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
iii) to a used oil collection center that is registered, licensed, permitted or recognized by government? (40 CFR 279.24(a)(3))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
b) self transportation of small amounts to aggregation point owned by the generator provided that the generator transports: (40 CFR 279.24(b))				
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(b)(1))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(b)(2))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
iii) the used oil to a used oil aggregation point that is owned/operated by the same generator? (40 CFR 279.24(b)(3))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
c) used oil is reclaimed and the processor returns the oil to the generator under tolling for use as lubricant, cutting oil, or coolant? (40 CFR 279.24(c))				
i) the contract indicates the type and amount of used oil and frequency? (40 CFR 279.24(c)(1))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
ii) the contract indicates the vehicle used to transport both ways is owned by the processor? (40 CFR 279.24(c)(2))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
iii) the contract indicates the oil will be returned to the generator? (40 CFR 279.24(c)(3))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A

USED OIL DISPOSAL (Rule 816)

10. Is used oil that cannot be recycled & is being disposed of & is not a hazardous waste managed in accordance w/ applicable federal & state regulations? (Rule 816(2))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
11. Is the used oil used as a dust suppressant? (Rule 816(3))	UOA	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A

COMMENTS:-



Waste, Pesticides and Toxics Division

ICIS
4.14.06

- Type of Document:
- ☐ Termination of Order
 - ☐ Notice of Violation and Inspection Report/Checklist
 - ☒ No Violation Letter and Inspection Report/Checklist
 - ☐ Letter of Acknowledgment
 - ☐ Information Request
 - ☐ Pre-Filing and Opportunity to Confer
 - ☐ State Notification of Enforcement Action

Facility Name : Cargill SALT

Facility Location: 916 So Riverside

City: Saint Clair State: MI 48079

U.S. EPA ID# MTID 005 317 185

Assigned Staff DUNAL CAMPBELL Phone: 6-4555

Name	Signature	Date
Author		04/13/2006
Regional Counsel	Rich GIORIZIO via e-mail	05/02/2006
Section Chief		4-14-06
Branch Chief		
Division Director		

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file copy.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

Duncan
Campbell/R5/USEPA/US
05/02/2006 01:01 PM

To Paul Little/R5/USEPA/US
cc
bcc

Subject Fw: Cargill

Paul --

I interpret this e-mail to be confirmation of my request - to send out under separate cover the no violation letter and inspection report to Cargill.

DC

----- Forwarded by Duncan Campbell/R5/USEPA/US on 05/02/2006 12:56 PM -----

Richard
Clarizio/R5/USEPA/US
05/02/2006 12:30 PM

To John Gierczak/R5/USEPA/US@EPA
cc Ann Coyle/R5/USEPA/US@EPA, Duncan
Campbell/R5/USEPA/US@EPA
Subject Re: Fw: Cargill

John, Duncan,

It looks fine to me (with John's suggestion added). Please send me a copy of the final version with attachments (including completed checklist that is mentioned).

Thanks

Rich
John Gierczak/R5/USEPA/US

John Gierczak /R5/USEPA/US To

04/28/2006 11:32 AM

Subject Fw: Cargill

During Wednesday's briefing for the Cargill MMI, the ECAT was informed that the RCRA program proposes to send a letter to Cargill informing them that no RCRA violations were identified as a result of the MMI. While I did not hear any objections to this proposal during the briefing, the ECAT manager did request that we coordinate with the ORC folks assigned to the Cargill MMI project on follow-up activities.

Attached is a copy of the RCRA letter and inspection report that Duncan Campbell intends to transmit to Cargill. I do not have any concerns regarding the transmittal of this information to Cargill. The only comment I have is that if the RCRA program will be enclosing the RCRA inspection report and checklist with the letter, the program may wish to indicate that in the letter.

Ann/Rich - In the event that either of you have comments or concerns regarding the transmittal of the letter, please let Duncan and me know (*Duncan are you under a deadline to get the letter out to Cargill? If so, please let Ann and Rich know, so they can respond to us in a timely manner*).

Thank you all.

regards, john



RTC.doc Narrative.doc

----- Forwarded by John Gierczak/R5/USEPA/US on 04/27/2006 04:09 PM -----

Duncan
Campbell/R5/USEPA/US

04/27/2006 10:49 AM

To John Gierczak/R5/USEPA/US@EPA

cc

Subject Cargill

John - Today is Thursday. I'm restating my request --- I would like to send out a compliance letter for my RCRA inspection, inclusive of a short narrative report and an even shorter MDEQ checklist. So, can I ?
Can I ?

Be bold. Be innovative. Shed those conservative SOP's.

Don Chutas
Plant Manager



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(810) 326-2829
(810) 329-6560 fax (810) 434-0009 cell
don_chutas@cargill.com



Anthony Hodny
EHS Coordinator



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tony



Wade D. Richards
Power House Superintendent



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Gary Rimmey, CSP, CMSP
EHS Manager
Salt and Deicing Technology



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Minnetonka, MN 55343
gary_rimmey@cargill.com

Tel: 952-984-8207
Fax: 952-984-8703

[Click Here To Print](#) **TSD Manifest - IL11667529****Manifest Date: 1/13/2006****Generator Information****Generator EPA ID:** MID005317185**Legal Name:** CARGILL SALT**Generator Address:** 916 S RIVERSIDE
SAINT CLAIR, MI 48079
ST CLAIR
U.S.A.**Country of Import:****TSD Information****TSD EPA ID:** ILD980613913**TSD Legal Name:** SAFETY KLEEN CORP**TSD Facility Address:** 633 E 138TH ST
DOLTON, IL 60419
COOK
U.S.A.**Transporter(s) Information****Transp. #1 EPA ID:****Any Attachments?**

--No--

Any Discrepancies?

--No--

Was Rejected?

--No--

Legal Name:**Is Commingled?**

--No--

Gen Agreed?

--No--

Manifest Line Details

Code #1	Code #2	Code #3	Code #4	Code #5	Code #6	Reported Mgmt. Code	Qty	Unit of Measure
D001	D011	--	--	--	--		20	Gallons

[Click Here To Print](#) **TSD Manifest - MI6330180****Manifest Date: 9/27/2005****Generator Information****Generator EPA ID:** MID005317185**Legal Name:** CARGILL SALT**Generator Address:** 916 S RIVERSIDE
SAINT CLAIR, MI 48079
ST CLAIR
U.S.A.**Country of Import:****TSD Information****TSD EPA ID:** KYD053348108**TSD Legal Name:** SAFETY KLEEN CORP**TSD Facility Address:** 3700 LAGRANGE ROAD
SMITHFIELD, KY 40068
HENRY
U.S.A.**Transporter(s) Information****Transp. #1 EPA ID:****Any Attachments?**

--No--

Any Discrepancies?

--No--

Was Rejected?

--No--

Legal Name:**Is Commingled?**

--No--

Gen Agreed?

--No--

Manifest Line Details

Code #1	Code #2	Code #3	Code #4	Code #5	Code #6	Reported Mgmt. Code	Qty	Unit of Measure
D001	--	--	--	--	--		16	Gallons
021L	--	--	--	--	--		60	Gallons

[View Corresponding Generator Manifest](#)

[Click Here To Print](#) **Generator Manifest - MI6330180****Manifest Date:** 9/21/2005**Generator Information****Generator EPA ID:** MID005317185**Legal Name:** CARGILL SALT**Generator Address:** 916 S RIVERSIDE
SAINT CLAIR, MI 48079
ST CLAIR
U.S.A.**Country of Import:****TSD Information****TSD EPA ID:** KYD053348108**TSD Legal Name:** SAFETY KLEEN CORP**TSD Facility Address:** 3700 LAGRANGE ROAD
SMITHFIELD, KY 40068
HENRY
U.S.A.**Transporter(s) Information****Transp. #1 EPA ID:** TXR000050930**Legal Name:** SAFETY KLEEN SYSTEMS INC**Any Attachments?****Any Discrepancies?****Was Rejected?****Is Commingled?**

--No--

--No--

--No--

--No--

Manifest Line Details

Code #1	Code #2	Code #3	Code #4	Code #5	Code #6	Source Code	Mgmt Code (G25)	Reported Mgmt. Code	Container #	Container Type	UN/NA	Qty	Unit of Measure
D001	--	--	--	--	--				1	DM	UN1493	16	Gallons
021L	--	--	--	--	--				2	DM		60	Gallons

[View Corresponding TSD Manifest](#)

[Click Here To Print](#)**Generator Manifest - MI6276552****Manifest Date:** 11/17/2004**Generator Information****Generator EPA ID:** MID005317185**Legal Name:** CARGILL SALT**Generator Address:** 916 S RIVERSIDE
SAINT CLAIR, MI 48079
ST CLAIR
U.S.A.**Country of Import:****TSD Information****TSD EPA ID:** KYD053348108**TSD Legal Name:** SAFETY KLEEN CORP**TSD Facility Address:** 3700 LAGRANGE ROAD
SMITHFIELD, KY 40068
HENRY
U.S.A.**Transporter(s) Information****Transp. #1 EPA ID:** TXR000050930**Legal Name:** SAFETY KLEEN SYSTEMS INC

Any Attachments?

Any Discrepancies?

Was Rejected?

Is Commingled?

--No--

--No--

--No--

--No--

Manifest Line Details

Code #1	Code #2	Code #3	Code #4	Code #5	Code #6	Source Code	Mgmt Code (G25)	Reported Mgmt. Code	Container #	Container Type	UN/NA	Qty	Unit of Measure
D001	--	--	--	--	--				1	DF	UN3098	5	Gallons
F003	--	--	--	--	--				1	DM	UN1230	5	Gallons
029L	--	--	--	--	--				1	DF	NA1993	5	Gallons

[View Corresponding TSD Manifest](#)

[Click Here To Print](#) **TSD Manifest - MI9411385****Manifest Date: 10/14/2004****Generator Information****Generator EPA ID:** MID005317185**Legal Name:** CARGILL SALT**Generator Address:** 916 S RIVERSIDE
SAINT CLAIR, MI 48079
ST CLAIR
U.S.A.**Country of Import:****TSD Information****TSD EPA ID:** IND000646943**TSD Legal Name:** POLLUTION CONTROL INDUSTRIES**TSD Facility Address:** 4343 KENNEDY AVE,
EAST CHICAGO, IN 46312
LAKE
U.S.A.**Transporter(s) Information****Transp. #1 EPA ID:** WAH000016923**Legal Name:** UNIVAR USA INC**Any Attachments?**

--Yes--

Any Discrepancies?

--No--

Was Rejected?

--No--

Is Commingled?

--No--

Gen Agreed?

--No--

Manifest Line Details

Code #1	Code #2	Code #3	Code #4	Code #5	Code #6	Reported Mgmt. Code	Qty	Unit of Measure
F005	--	--	--	--	--		110	Gallons

[View Corresponding Generator Manifest](#)

[Click Here To Print](#) **Generator Manifest - MI9411385****Manifest Date:** 10/8/2004**Generator Information****Generator EPA ID:** MID005317185**Legal Name:** CARGILL SALT**Generator Address:** 916 S RIVERSIDE
SAINT CLAIR, MI 48079
ST CLAIR
U.S.A.**Country of Import:****TSD Information****TSD EPA ID:** IND000646943**TSD Legal Name:** POLLUTION CONTROL INDUSTRIES**TSD Facility Address:** 4343 KENNEDY AVE,
EAST CHICAGO, IN 46312
LAKE
U.S.A.**Transporter(s) Information****Transp. #1 EPA ID:** WAH000016923**Legal Name:** UNIVAR USA INC**Any Attachments?**

--No--

Any Discrepancies?

--No--

Was Rejected?

--No--

Is Commingled?

--No--

Manifest Line Details

Code #1	Code #2	Code #3	Code #4	Code #5	Code #6	Source Code	Mgmt Code (G25)	Reported Mgmt. Code	Container #	Container Type	UN/NA	Qty	Unit of Measure
F005	--	--	--	--	--				2	DM	UN1263	110	Gallons

[View Corresponding TSD Manifest](#)

[Click Here To Print](#)**Generator Manifest - MI6188584****Manifest Date: 4/24/2003****Generator Information****Generator EPA ID:** MID005317185**Legal Name:** CARGILL SALT**Generator Address:** 916 S RIVERSIDE
SAINT CLAIR, MI 48079
ST CLAIR
U.S.A.**Country of Import:****TSD Information****TSD EPA ID:** KYD053348108**TSD Legal Name:** SAFETY KLEEN CORP**TSD Facility Address:** 3700 LAGRANGE ROAD
SMITHFIELD, KY 40068
HENRY
U.S.A.**Transporter(s) Information****Transp. #1 EPA ID:** TXR000050930**Legal Name:** SAFETY KLEEN SYSTEMS INC**Any Attachments?**

--No--

Any Discrepancies?

--No--

Was Rejected?

--No--

Is Commingled?

--No--

Manifest Line Details

Code #1	Code #2	Code #3	Code #4	Code #5	Code #6	Source Code	Mgmt Code (G25)	Reported Mgmt. Code	Container #	Container Type	UN/NA	Qty	Unit of Measure
D001	--	--	--	--	--				1	DM	UN1268	85	Gallons
D001	--	--	--	--	--				2	DM	UN1219	110	Gallons
029L	--	--	--	--	--				1	DM		150	Pounds

[View Corresponding TSD Manifest](#)

CARGILL SALT

St. Clair, MI

FACILITY OPERATIONS

The Cargill Salt facility currently draws fresh water from the St. Clair River and reuses process waters, both of which are injected into deep rock salt deposits through a series of injection wells that are located in the Marvin and Mead Brine Fields. Underground pipelines transport the water from the plant to the brine fields. The water is injected into the wells and into the underground salt gallery. This water dissolves the underground salt, which is then transported back to the surface and ultimately to the plant via an underground pipeline system. The brine enters one of six brine ASTs, which are located on the west side of the facility's property. Soda ash and lime are added to the brine in order to remove impurities.

Saturated brine (NaCl) is then fed to a multi-stage vacuum pan evaporation system and four Alberger® Flake salt processing systems. These systems concentrate the brine into salt slurry, a mixture of salt crystals and brine. The brine is concentrated in each of the systems using tube and shell heaters with steam as the heating medium. The steam is generated in a natural gas and coal fired boiler. The concentrated salt slurry is then sent to a wash column where surface impurities are removed. The wash column discharges salt slurry to top feed filter drum dryers. Following the drying operations, the salt is sent to various processing areas. The processing areas include screening, conveying, compaction, and packaging operations. The salt products are shipped via rail and trucks. The finished products are all bagged for shipment.

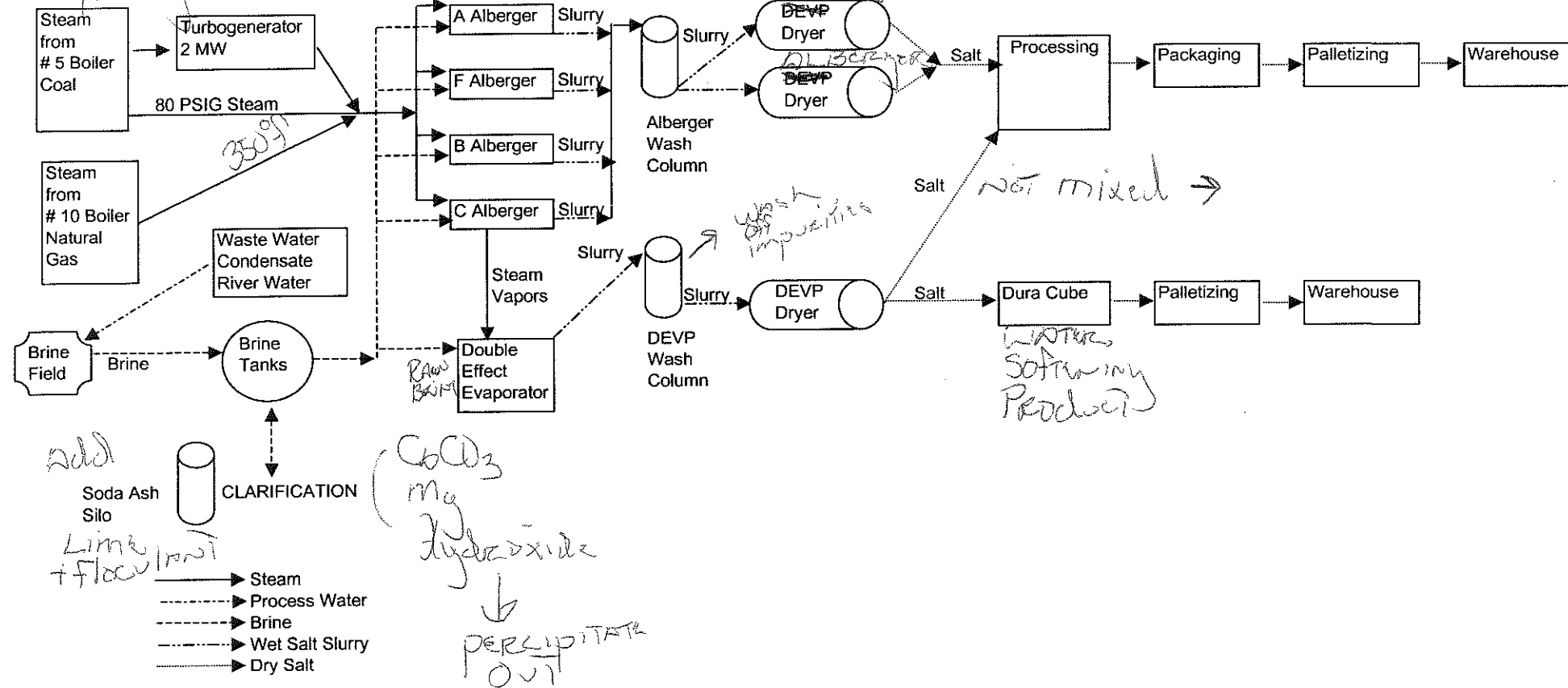
Cargill Salt operates up to 24 hours per day, 7 days per week, 52 weeks per year and employs up to 200 people.

4 shifts
4 on 4 off
12 hr shifts

SiCl
KCR +
Methanol

Cargill Salt St. Clair, MI Process Flow Diagram

Need 4 MW
to run full
capacity
200°F





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393092 / MID005317185 CARGILL SALT

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Manifest Number	Manifest Date (2004)	Generator	TSD	To
MI6276552	11/25/2004	MID005317185	KYD053346108	0.0
MI9411385	10/14/2004	MID005317185	IND000646943	0.0
MI7607941	4/16/2004	MID005317185	NCD982170292	0.0
MI7607940	4/8/2004	MID005317185	MID980991566	0.0
IL09939915	3/1/2004	MID005317185	ILD980613913	0.0

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393092 / MID005317185 CARGILL SALT

Site Information

Site ID	MID005317185	Site Legal Name	CARGILL SALT
WMD ID	393092	Site Specific Name	CARGILL SALT
District	SOUTHEAST MICHIGAN		
NAICS Codes	325998 - All Other Miscellaneous Chemical Product and Preparation Manufacturing 311942 - Spice and Extract Manufacturing		
Location Address	916 S RIVERSIDE SAINT CLAIR, MI 48079 County: ST CLAIR Country: U.S.A.		
Mailing Address	916 S RIVERSIDE SAINT CLAIR, MI 48079 County: ST CLAIR Country: U.S.A.		

Food
grade
SALT

Site Owners / Operators

Name	Org Type	Active	Inactive	Owner
CARGILL INCORPORATED	Private	4/27/1997		Yes
AKZO SALT	Private	4/25/1997	4/26/1997	Yes

Current Site Activities

Discovery Date	Source	Activity
11/2/2004	Notification (Site)	Hazardous Waste Activities Conditionally Exempt Small Quantity Generator Liquid Industrial Waste Activities LIW Generator

[+ click to expand](#)

Previous Site Activities

Site Comments

Date	Type	Comment
2/18/2005	111/121-HW/LIW	UPDATE-TAX ID-BUD
11/2/2004	111/121-HW/LIW	PER SUBSEQUENT NOTIFICATION, CHANGE OF STATUS FROM TO CESQG AND LIW GENERATOR 11-2-04 JDL
4/14/2004	111/121-HW/LIW	2003 ANNUAL USER CHARGE - GENERATOR CHANGED GENE STATUS FROM SQG TO CESQG-ES.
2/25/2004	111/121-HW/LIW	CORRECTED FEDERAL TAX ID PER SITE CONTACT-BUD
6/20/2003	111/121-HW/LIW	FEES & UPDATES-CHANGES, SQG STATUS, LIW GENERATOR
12/20/2002	111/121-HW/LIW	SQG VERIFICATION-CHANGE, NAICS CODES-BUD
3/5/2002	111/121-HW/LIW	2001 BIENNIAL REPORT - NO CHANGES-ES.

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John Sierczak
Tuesday 3/28/2006
8:30 AM
EST

OFF-416
-250-
1713

Food grade SALT

1 ^{active}

1 brown field - Mend